

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

NOTICE OF MARKET-DOMINANT
PRICE ADJUSTMENT

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Docket No. R2015-4

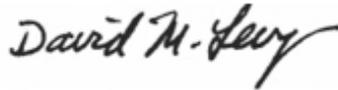
**MOTION OF ALLIANCE OF NONPROFIT MAILERS
FOR CLARIFICATION OF ORDER NO. 2378
(March 9, 2015)**

The Alliance of Nonprofit Mailers (“ANM”) respectfully requests that the Commission clarify one aspect of Order No. 2378, which the Commission issued in this case on March 6, 2015. The Order does not appear to address an important issue raised by ANM in its February 19 comments: the failure of the Postal Service to justify its proposal to establish prices for nonprofit Standard Mail that would generate revenue per piece averaging 60.425 percent of the average revenue per piece of commercial Standard Mail. Absent a cogent demonstration that achieving a ratio closer to 60 percent would be impracticable, the Postal Service’s proposal to overshoot the 60 percent mark by this amount is a clear violation of 39 U.S.C. § 3626(a)(6)(B). ANM Comments at 2-4. Order No. 2378, while remanding the rates proposed by the Postal Service on nonprofit Standard Mail (among other mail classes and subclasses within the Standard Mail, Periodicals Mail and Package Service Products), does not specifically mention the 60 percent issue.

Perhaps the Commission meant to encompass the issue in ordering paragraph 3 on page 32 of Order No. 2378, which directs the Standard Mail to “submit amendments” to the price adjustments for Standard Mail “that achieve compliance with title 39, legal

precedent, and applicable regulations in accordance with 39 C.F.R. § 3010.11.(f).” If so, ANM respectfully requests that the Commission state so explicitly to avoid any confusion. If not, ANM requests that the Commission provide an explanation for its disposition of the issue.

Respectfully submitted,

A handwritten signature in black ink that reads "David M. Levy". The signature is written in a cursive, flowing style.

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March 9, 2015